

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

KELLY DAWSEY,)	
)	
)	
Plaintiff,)	
)	
v.)	C.A. No. 7:22-cv-03738-TMC
)	
BAYERISCHE MOTOREN WERKE)	
AKTIENGESELLSCHAFT and BMW)	
MANUFACTURING CO., LLC collectively)	
d/b/a “BMW GROUP,”)	
)	
Defendants.)	

DEFENDANT BMW MANUFACTURING CO. LLC’S
REQUEST FOR PROTECTION

COMES NOW Defendant, BMW Manufacturing Co., LLC, pursuant to the Court’s direction at the May 6 status conference (ECF No. 128), and requests protection for the following dates from December 1, 2025, through March 31, 2026.

<u>Dates</u>	<u>Attorney/Witness</u>	<u>Reason for Protection</u>
December 11-17	Scott Medley	Scheduled vacation
December 15-19	Randy Moody	Travel to Texas for son’s graduation
December 15-January 9	Eva Burgmeier	Holiday travel
December 16-January 2	Robert Engelhorn	Holiday travel
February 16-20	Eva Burgmeier	Scheduled vacation

Respectfully submitted this the 26th day of June, 2025.

By: s/ Ellison F. McCoy

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